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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

HANSON DAI, et al.,

Plaintiffs,

v.

SAS INSTITUTE INC., et al.,

Defendants.

Lead Case No.: 4:24-cv-02537-JSW

**STIPULATED ~~PROPOSED~~ REVISED  
SCHEDULE AND ORDER THEREON ~~AS~~  
~~MODIFIED~~**

Pursuant to Civil L.R. 6-2 and 7-12, defendants SAS Institute Inc., IDEaS, Inc., Four Seasons Hotels Limited, Hilton Domestic Operating Company Inc., Wyndham Hotels & Resorts, Inc., Hyatt Corporation, and Omni Hotels Management Corporation (collectively, “Defendants”) and plaintiffs Hanson Dai, Max Chiswick, Adolph Robles, Steven Stack, Matthew Gilbert, Michael Molinaro, Tony Qin, Mark Lester, Steven Shattuck, and Joel Kamisher (collectively, “Plaintiffs,” and together with Defendants, the “Parties”) respectfully stipulate as follows:

1. On August 8, 2024, the Court entered the Parties’ proposed scheduling order, as follows (“Current Schedule”) (*see* ECF 93):

Case Management Event	Deadline
Deadline to file ADR Certification. (See ADR L.R. 3)	11/22/2024
Deadline to meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan. (See F.R. Civ. P. 26(f))	04/25/2025
Deadline to file Joint Case Management Statement	05/02/2025
Deadline to make initial disclosures. (See F.R. Civ P. 26(a)(1))	05/09/2025
Initial Case Management Conference	05/09/2025

2. The Court also previously ordered, and the Parties stipulated, that the deadlines for the Fed. R. Civ. P. 26(f) conference and Fed. R. Civ. P. 26(a)(1) disclosures should fall after the Court’s decision on Defendants’ Rule 12 motions. *See* ECF No. 93.

3. On March 21, 2025, the Court granted SAS Institute Inc.’s Rule 12 motion to dismiss, granting Plaintiffs leave to amend and deferring a deadline on any amendments until resolution of Defendants’ joint motion to dismiss. *See* ECF No. 129.

4. On April 18, 2025, the Court entered the Parties’ Stipulated Request for Order Changing Time (L.R. 6-2), vacating all deadlines in the Current Schedule and directing the Parties to file a proposed revised schedule within 14 days of the Court’s decision on Defendants’ joint Rule 12 motion. *See* ECF No. 132. The Parties again agreed that the deadlines for the Fed. R. Civ. P. 26(f) conference and Fed. R. Civ. P. 26(a)(1) disclosures should fall after the Court’s decision on Defendants’ Rule 12 motions for efficiency reasons. *See* ECF No. 132.

5. On July 18, 2025, the Court granted Defendants’ motion to dismiss, with leave to amend, and set the following deadlines (*see* ECF 137):

Event	Deadline
Plaintiffs Amended Complaint	August 25, 2025
Defendants answer or move to dismiss	September 15, 2025

Case Management Conference Statement	October 3, 2025
Case Management Conference	October 10, 2025

6. The Parties agree that the deadlines for the Fed. R. Civ. P. 26(f) conference and Fed. R. Civ. P. 26(a)(1) disclosures should fall after the Court's decision on Defendants' Rule 12 motions to dismiss Plaintiffs' amended complaint for efficiency reasons.

7. The Parties agree to file proposed revised deadlines 14 days after the Court's decision on the Defendants' Rule 12 motions to dismiss Plaintiffs' amended complaint, if needed.

NOW THEREFORE, the Parties request that the Court enter an Order staying the deadlines for the Fed. R. Civ. P. 26(f) conference and Fed. R. Civ. P. 26(a)(1) disclosures and direct the Parties to file, if needed, proposed revised deadlines within 14 days after the Court's decision on Defendants' Rule 12 motions and provide the Declaration of Lauren Norris Donahue in support of this Stipulated Request.

Dated: August 1, 2025

/s/ Timothy Z. LaComb

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**FILER'S ATTESTATION**

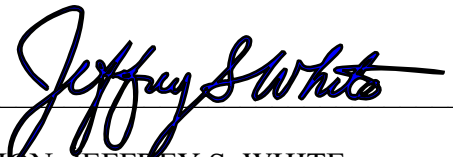
Pursuant to Civil L.R. 5-1(i)(3), I, Michael Stortz, hereby attest that concurrence in the filing of this document has been obtained from each of the above signatories.

Dated: August 1, 2025

By: /s/ Michael J. Stortz  
Michael J. Stortz

**PURSUANT TO STIPULATION AND FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.**

The case management conference scheduled for October 10, 2025 and associated deadlines are VACATED.  
Dated: August 4, 2025

  
HON. JEFFREY S. WHITE  
United States District Judge